

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

NATALIA CEBOLLERO BERTRÁN
Plaintiff

CIVIL NO. 3:19-cv-1412 GAG-
BJM

v.

PUERTO RICO AQUEDUCT AND SEWER
AUTHORITY.
Defendant

VIOLATIONS OF CLEAN
WATER ACT, NEGLIGENCE;
RIPARIAN RIGHTS

JURY TRIAL DEMANDED

MOTION TO REQUEST ORDER TO FILE PLEADING

TO THE HONORABLE COURT:

NOW COMES PLAINTIFF, represented by the undersigned counsels, and respectfully states and prays as follows:

1. It has come to the attention of Plaintiff that, on the docket, it does not appear that defendant PRASA has filed an Answer to the Complaint, neither when process was served, Dkt No. 4, nor when the mandate of US Court of Appeals to Plaintiff's Notice of Appeal was entered, see Dkt No. 22.

2. To this date, even when an initial scheduling conference was held, Dkt No. 30, defendant PRASA has not filed its Answer to the Complaint, as required by the Federal Rules of Civil Procedure. Plaintiff states that without an answer being properly filed, she cannot complete her interrogatories nor requests for production of documents, for lack of knowledge of defendant's affirmative defenses.

3. Therefore, Plaintiff requests the Court to order PRASA to file an Answer to the Complaint, FRCP Rule 12(a)(1)(A)(i) or else, enter a default ruling pursuant FRCP Rule 55(a).

4. Likewise, Plaintiff requests the Court to allow her to serve the interrogatories and request of production of documents, within ten (10) days after PRASA has filed the requested Answer to the Complaint.

WHEREFORE, plaintiff respectfully requests the Honorable Court to order PRASA to file its Answer to the Complaint pursuant FRCP Rule 12(a)(1)(A)(i), or else, entering a default ruling; and allowing Plaintiff to serve the discovery process within ten (10) days after defendant has filed its pleading.

RESPECTFULLY SUBMITTED.

At San Juan Puerto Rico, September 16th, 2021.

s/ José Luis Ramírez de León
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CERTIFICATE OF SERVICE

I hereby certify that on **September 16, 2021**, I electronically filed the foregoing motion, titled **MOTION TO REQUEST ORDER TO FILE PLEADING** with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

- **José L. Ramírez de León**, jramirez639@msn.com joselramirez@me.com
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At San Juan Puerto Rico, **September 16th, 2021**.

s/ José Luis Ramírez de León
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